Dr. William Stokes, Director NICEATM (MD EC-17), NIEHS P.O. Box 12233 Research Triangle Park, NC 27709

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Dear Dr. Stokes:

After years of protest from animal activists, the LD50 Test (in which animals are force fed chemicals to estimate the dose needed to kill 50% of them) is slowly being phased out internationally and is being replaced with tests that use fewer animals [or none at all]. A recent workshop held by the National Institute of Environmental Health Sciences (NIEHS), a government agency that researches the health effects of environmental hazards, addressed the feasibility of going one step further and replacing the animal tests completely with in-vitro cell culture tests. Scientists at the NIEHS workshop have agreed to a partial implementation of in vitro testing, to set a "starting dose" for the lethal poisoning tests, which would have the effect of further reducing the number of animals in the tests. As you know, the NIEHS is inviting the public to comment on the findings of

these scientists and the use of in-vitro cell cultures as a replacement for lethal animal tests.

I ask that you begin efforts to completely replace lethal dose testing with non-animal, in vitro testing methods.

Thank you for the opportunity to bring these remarks to your attention.

Mindful of the responsibilities which stand before you, I am,

Yours sincerely, Robert E. Rutkowski, Esq.